

# EXHIBIT C

**Messer, Suzanne**

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**From:** Messer, Suzanne  
**Sent:** Thursday, May 20, 2021 11:13 AM  
**To:** Roy Willey; Blake Abbott; John Bradham; CULT; Service1@akimlawfirm.com  
**Cc:** Fellows, Jonathan  
**Subject:** Marbury v. Pace University  
**Attachments:** Notice of Deposition of Plaintiff(12541312.1).pdf; LTR to Roy T. Willey, IV, Esq. re depositions (final)(12541246.1).pdf

Counselors –

Please see the attached.

Suzanne Messer

**Suzanne Messer**

Member  
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May 20, 2021

**VIA ELECTRONIC MAIL** ([roy@akimlawfirm.com](mailto:roy@akimlawfirm.com))

Roy T. Willey, IV, Esq.  
Anastopoulo Law Firm, LLC  
32 Ann Street  
Charleston, S.C., 29403

Re: *Marbury v. Pace University*  
*Civil Action No. 1:20-cv-3210 (SDNY) (JMF)*

Dear Roy:

Enclosed please find a Notice of Deposition of Plaintiff Xaviera Marbury.

Please inform us of individuals of Pace University that you intend to depose, so that we can arrange for those individuals to be available at mutually convenient times between now and the discovery deadline of August 6, 2021.

Very truly yours,

BOND, SCHOENECK & KING, PLLC

*s/Jonathan B. Fellows*

Jonathan B. Fellows

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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XAVIERA MARBURY, INDIVIDUALLY AND ON  
BEHALF OF OTHERS SIMILARLY SITUATED,

Plaintiff,

v.

PACE UNIVERSITY,

Defendant.

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**NOTICE OF DEPOSITION  
OF PLAINTIFF XAVIERA  
MARBURY**

Civil Action No. 20-cv-3210-  
JMF

**PLEASE TAKE NOTICE**, that, on June 29, 2021 beginning at 9:30 am at the office of Bond, Schoeneck & King, PLLC located at 600 Third Avenue, 22<sup>nd</sup> Floor, New York, New York 10016-1915, Defendant Pace University will take the deposition upon oral examination of Plaintiff Xaviera Marbury pursuant to Rule 30 of the Federal Rules of Civil Procedure, before a notary public or other officer duly authorized to administer oaths. The testimony shall be recorded by videographic and stenographic means.

Dated: May 20, 2021

BOND, SCHOENECK & KING, PLLC

By: s/Jonathan B. Fellows  
Jonathan B. Fellows, Esq.  
Suzanne M. Messer, Esq.  
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